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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

LAS VEGAS SUN, INC., a Nevada
corporation,

Plaintiff,

v.

SHELDON ADELSON, an individual and as
the alter ego of News+Media Capital Group
LLC and as the alter ego of Las Vegas Review
Journal, Inc.; PATRICK DUMONT, an
individual; NEWS+MEDIA CAPITAL
GROUP LLC, a Delaware limited liability
company; LAS VEGAS REVIEW-JOURNAL,
INC., a Delaware corporation; and DOES, I-X,
inclusive,

Defendants.

Case No. 2:19-cv-01667-GMN-VCF

**STIPULATION AND ORDER
REGARDING SEALING (1)
DEFENDANTS' OBJECTION TO
MAGISTRATE JUDGE'S ORDER RE:
PLAINTIFF & COUNTERDEFENDANTS'
MOTION FOR A PROTECTIVE ORDER
(ECF NO. 619); AND (2) PLAINTIFF'S
OBJECTION TO ORDER OVERRULING
PLAINTIFF'S OBJECTION TO THE
SPECIAL MASTER'S ORDER (ECF NO.
619)**

1 LAS VEGAS REVIEW-JOURNAL, INC., a
2 Delaware corporation,

3 Counterclaimant,

4 v.

5 LAS VEGAS SUN, INC., a Nevada
6 corporation; BRIAN GREENSPUN, an
7 individual and as the alter ego of Las Vegas
8 Sun, Inc.; GREENSPUN MEDIA GROUP,
9 LLC, a Nevada limited liability company, as
10 the alter ego of Las Vegas Sun, Inc.,

11 Counterclaim-
12 Defendants.

1 Plaintiff/Counterdefendant LAS VEGAS SUN, INC., and Counterdefendants BRIAN
 2 GREENSPUN and GREENSPUN MEDIA GROUP, LLC (collectively the “Sun”), by and through
 3 their counsel Lewis Roca Rothgerber Christie LLP, Pisanelli Bice PLLC, and the Alioto Law Firm,
 4 and Defendant/Counterclaimant LAS VEGAS REVIEW-JOURNAL, INC., and Defendants
 5 NEWS+MEDIA CAPITAL GROUP LLC, SHELDON ADELSON, and PATRICK DUMONT
 6 (collectively the “Review-Journal”), by and through their counsel of record, Kemp Jones, LLP,
 7 Jenner & Block LLP, and Richard L. Stone, Esq., hereby stipulate and agree as follows:

8 1. On March 18, 2022, the Court ordered, *inter alia*, the parties to meet and confer
 9 prior to filing any additional motions to seal. The parties’ met-and-conferred on April 1, 2022,
 10 regarding sealing relating to Defendants’ Objection to Magistrate Judge’s Order Re: Plaintiff and
 11 Counterdefendants’ Motion for a Protective Order (ECF No. 619) (“Review-Journal’s
 12 Objection”); and Plaintiff’s Objection to Order Overruling Plaintiff’s Objection to the Special
 13 Master’s Order regarding Interrogatories 14-15 (ECF No. 619) (“Sun’s Objection”). For the Sun,
 14 Marla Hudgens, Esq. appeared, and for the Review-Journal, Mona Kaveh, Esq. appeared.

15 2. Regarding the Review-Journal’s Objection, the parties agree that the following is
 16 appropriate for sealing:

17 (a) References to the non-public portions of the 2019 final arbitration award. These same
 18 references were ordered sealed by the Special Master on January 5, 2022, under the same
 19 good cause standard. *See* ECF No. 554 at 2:4–5 (Special Master granting Defendants’
 20 motion to seal at ECF No. 530, which sought to seal the exact same reference to the 2019
 21 final arbitration award under the good cause standard);

22 (b) Portions of Exhibit C, which contains excerpts of the deposition transcript of the Sun’s
 23 30(b)(6) designee. The portion sealed at 162:20–25 relates to specific figures that the Sun
 24 has marked as Attorneys’ Eyes Only; and

25 (c) Exhibit D, which contains excerpts of the deposition transcript of Brian Greenspun.
 26 Exhibit D is filed under seal because Mr. Greenspun’s deposition transcript is temporarily
 27 designated as “Confidential” in its entirety pursuant to the parties’ Protective Order, and
 28 the parties have until 30 days after receipt of the deposition transcript to confirm which

portions, if any, should remain “Confidential” or be further designated as “Attorney’s Eyes Only.” ECF No. 87 ¶ 7(a). The parties did not receive Mr. Greenspun’s final deposition transcript until April 1, 2022, and so given that the 30-day deadline has not run, Exhibit D is provisionally filed under seal. Furthermore, the transcript excerpts in Exhibit D contain discussions and references to confidential and/or proprietary materials that have been marked Confidential by the Sun as part of its discovery production because they contain confidential and/or proprietary information that the Sun alleges would be harmful to the Sun if disclosed to the public.

3. Regarding the Sun’s Objection, the parties agree that the following is appropriate for sealing:

- (a) References to non-public portions of the 2019 final arbitration award;
- (b) Exhibit 1, which contains excerpts of the deposition transcript of Steven Hall from the confidential 2019 arbitration; and
- (c) Portions of Exhibit 2, which contains Defendants’ Supplement to First Amended Responses to Plaintiff’s Interrogatories (First Set) (“Supplement”). For Exhibit 2, the Sun seeks to redact only certain exhibits attached to the Supplement that the Review-Journal marked as Attorney’s Eyes Only, specifically exhibits 3, 4, and 6 to the Supplement.

As for the arbitration materials, as mentioned above, this Court has similarly sealed materials from the 2019 private arbitration, including the 2019 final arbitration award and 2019 arbitration testimony, under the same lower good cause standard. *See, e.g.*, Court Orders at ECF No. 303 at 45:19–47:2, 52:22–54:16; ECF No. 368 at 17:4-8; and ECF No. 421 at 2:18-20 (all finding good cause to seal various 2019 arbitration materials attached to discovery briefs); *see also* ECF No. 554 (cited above); 01/10/22 Hearing Transc. at 63:12–65:2 (Special Master granting Defendants’ sealing motion at ECF No. 508 relating to the sealing of the non-public portions of the 2019 final arbitration award and holding, “So my view is that the motion to seal by defendants, the non-public portions of the arbitration award, should simply be granted consistent with what I said last week.”).

1 DATED this 1st day of April, 2022.

DATED this 1st day of April, 2022.

2 LEWIS ROCA ROTHGERBER CHRISTIE LLP

KEMP JONES LLP

3
4 By: /s/ Marla J. Hudgens

By: /s/ Mona Kaveh

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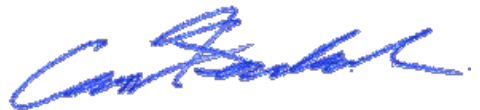
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*Attorneys for Defendants/
Counterclaimant*

22 IT IS SO ORDERED:

23 

24 UNITED STATES MAGISTRATE JUDGE

25 7-26-2022

26 DATED: _____